

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NORTH DAKOTA**

|   |   |                   |
|---|---|-------------------|
| In re:                                    | § |                   |
|   | § | Chapter 7         |
|   | § | Case No. 24-30167 |
| Pro-Mark Services, Inc.,                  | § |                   |
|   | § |                   |
| Debtor.                                   | § |                   |
| <hr style="width: 45%; margin-left: 0;"/> |   |                   |
| Erik A. Ahlgren, as Chapter 7 trustee of  | § | Adv. No. 24-07014 |
| Bankruptcy Estate of Pro-Mark             | § |                   |
| Services, Inc., as Administrator of the   | § |                   |
| Pro-Mark Services, Inc. Employee Stock    | § |                   |
| Ownership Plan, and as Trustee of the     | § |                   |
| Pro-Mark Services, Inc. Employee Stock    | § |                   |
| Ownership Trust,                          | § |                   |
|   | § |                   |
| Plaintiff,                                | § |                   |
|   | § |                   |
|   | § |                   |
| v.  | § |                   |
|   | § |                   |
| Connie Berg, Kyle Berg, Connie Berg       | § |                   |
| Revocable Living Trust, Kyle R. Berg      | § |                   |
| Revocable Living Trust, and Miguel        | § |                   |
| Paredes,                                  | § |                   |
|   | § |                   |
| Defendants.                               | § |                   |
|   | § |                   |

**STIPULATED MOTION TO CONTINUE SCHEDULING CONFERENCE**

Plaintiff Erik A. Ahlgren, as Chapter 7 Trustee of the Bankruptcy Estate of Pro-Mark Services, Inc. (“Debtor”), as Administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan, and as Trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust (the “Plaintiff”); Connie Berg, Kyle Berg, Connie Berg Revocable Living Trust, and Kyle R. Berg Revocable Living Trust (collectively,

the “Berg Defendants”), and Miguel Paredes file this Stipulated Motion to Continue Scheduling Conference and respectfully show the Court as follows:

1. On August 20, 2025, counsel for Plaintiff, the Berg Defendants, and Mr. Paredes agreed to hold a conference on Friday, August 29, 2025 at 9 A.M., pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, made applicable by Federal Rule of Bankruptcy Procedure 7026 and Local Rule 7026-1.
2. On August 21, 2025, the Court ordered that a scheduling conference be held by telephone on Thursday, August 28, 2025, at 10:00 A.M. (Dkt. 158.)
3. Lead counsel for the Berg Defendants is traveling and unavailable on August 28, 2025 at 10:00 A.M.
4. On August 22, 2025, counsel for Plaintiff, the Berg Defendants, and Mr. Paredes discussed the Court’s order and agreed to file this Stipulated Motion requesting that the scheduling conference be continued until September 4, 2025.
5. Plaintiff, the Berg Defendants, and Mr. Paredes hereby jointly move the Court, by stipulation, for an order continuing the scheduling conference to September 4, 2025.

Dated: August 25, 2025

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Dated: August 25, 2025

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Dated: August 25, 2025

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